

1 C 06-02057 JF

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3 **Specified Discovery Plan for Plaintiff KinderStart.com LLC regarding Defendant**
4 **Google**

- 5 1. The actual frequency and times when PageRank™ for www.kinderstart.com was
6 internally calculated and recalculated during the period January 1, 2005 to May
7 31, 2006;
- 8 2. The actual frequency and times when PageRank for www.kinderstart.com was
9 presented for viewing over the Internet from January 1, 2005 to May 31, 2006;
- 10 3. Source code, specifications, schematics, flow charts, artwork, formulas, or other
11 internal documentation sufficient to show the operations of any and all aspects
12 and elements of PageRank;
- 13 4. Any internal prepared engineering, mathematical or statistical analyses, white
14 papers or specifications relating to the formulation or calculation of PageRank,
15 including without limitation engineering design and scientific or statistical
16 modeling using Markov analysis;
- 17 5. Quantitative listing of backlinks as prepared by Google for www.kinderstart.com
18 at all relevant times;
- 19 6. Raw quantitative inputs for the PageRank as prepared and used by Google for
20 www.kinderstart.com at all relevant times;
- 21 7. All human, qualitative, or subjective factors, if any, that impinged, directly or
22 indirectly, on PageRank that resulted in a '0' Page Rank for
23 www.kinderstart.com, at all relevant times; and
- 24 8. All factors, methods, algorithms or other means by which a Website on the
25 Internet may receive an assigned PageRank of '0' by Google.
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